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Attorneys for Defendant
CENTENE CORPORATION

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

SHANIL SHANKAR, an individual,
Plaintiff,

v.

CENTENE CORPORATION, a Delaware
corporation; and DOES 1 through 25,
inclusive,
Defendant.

Case No. 2:21-cv-01224-KJM-CKD

**JOINT STIPULATION TO
CONTINUE DISCOVERY CUT-
OFF AND ORDER THEREON**

Trial Date: None Set
Complaint Filed: June 4, 2021

STIPULATION

Plaintiff SHANIL SHANKAR (“Plaintiff”) and Defendant CENTENE CORPORATION (“Defendant”) (collectively, the “Parties”) through counsel, have met and conferred and hereby stipulate as follows:

WHEREAS, on August 18, 2022, by stipulation of the Parties, the Court ordered the fact discovery cut-off date in this matter be continued to February 11, 2023.

WHEREAS, on August 18, 2022, by stipulation of the Parties, the Court ordered the deadline to exchange expert disclosures in this matter be continued to March 29, 2023.

WHEREAS, on August 18, 2022, by stipulation of the Parties, the Court ordered that the deadline to submit rebuttal expert disclosures be continued to April 26, 2023.

WHEREAS, on August 18, 2022, by stipulation of the Parties, the Court ordered the expert discovery cut-off deadline be continued to May 17, 2023.

WHEREAS, after the court ordered the above continuances, the handling attorney at defense counsel’s law firm left and is no longer assigned to this case.

WHEREAS, the change in counsel has caused some delay in the litigation of this matter; however, the Parties have been actively engaging in the discovery process by exchanging written discovery and are currently meeting and conferring regarding supplemental responses to the same and have been meeting and conferring regarding taking depositions in this matter;

WHEREAS, following meet and confer efforts, the Parties have agreed that additional time is needed to complete necessary discovery;

WHEREAS, the current discovery deadline necessitates that Plaintiff file motions to compel so as to not waive their rights, and an extension of the current deadline will help avoid unnecessary discovery motions.

1 WHEREAS, the parties have been engaging in settlement negotiations,
2 and an extension of the current discovery deadline may assist the parties in resolving
3 this matter before trial, thereby advancing the interests of judicial economy.

4 WHEREAS, the Parties have stipulated to continue the current discovery
5 cut-off by 90 days, making the new fact discovery cut-off date May 12, 2023 or as
6 soon thereafter as the Court deems necessary;

7 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED,
8 by and between the Parties through their respective counsel of record and subject to
9 the Court's approval, as follows:

10 1. The fact discovery cut-off deadline of February 11, 2023 is hereby
11 continued to May 12, 2023.

12 2. The deadline to exchange expert disclosures is hereby continued to
13 June 9, 2023.

14 3. The deadline to submit rebuttal expert disclosures is hereby
15 continued to July 7, 2023.

16 4. The expert discovery cut-off deadline is hereby continued to July
17 28, 2023.

18 **IT IS SO STIPULATED.**

19
20 Dated: February _6_, 2023

JML LAW, A Professional Corporation

21
22 /s/ Brooke C. Bellah
23 NICHOLAS W. SARRIA
BROOKE C. BELLAH

24 Attorneys for Plaintiff
25 SHANIL SHANKAR
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27
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1 Dated: February 6_, 2023

LITTLER MENDELSON P.C.

2
3 /s/ Rebecca Schack

4 BARBARA A. BLACKBURN
REBECCA SCHACK

5 Attorneys for Defendant
6 CENTENE CORPORATION
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ORDER

Having considered the parties' stipulation, and good cause appearing, the court orders the following:

1. The fact discovery cut-off deadline of February 11, 2023 is hereby continued to May 12, 2023.
2. The deadline to exchange expert disclosures is hereby continued to June 9, 2023.
3. The deadline to submit rebuttal expert disclosures is hereby continued to July 7, 2023.
4. The expert discovery cut-off deadline is hereby continued to July 28, 2023.

In light of the above, the dispositive motion hearing cut-off deadline is hereby continued to September 1, 2023.

IT IS SO ORDERED.

DATED: February 8, 2023.


CHIEF UNITED STATES DISTRICT JUDGE